

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UTILITY WORKERS, LOCAL 369,
Plaintiff,

v.

EXELON NEW ENGLAND POWER
SERVICES, INC.,
Defendant.

C.A. No. 04-CV-10293DPW

JOINT MOTION TO EXTEND TIME TO FILE A RESPONSIVE PLEADING

Defendant Exelon New England Power Services, Inc. ("Exelon") and Plaintiff Utility Workers, Local 369, hereby file this Joint Motion to Extend Time to File a Responsive Pleading, and jointly move the Court to extend the time in which Exelon must file a responsive pleading to Plaintiff's Complaint, up to and including April 9, 2004. As grounds for this Motion, the parties state that they are exploring a potential negotiated resolution of this litigation.

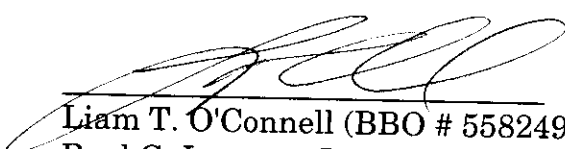
WHEREFORE, the parties respectfully request that the Court allow this
Joint Motion.

Respectfully submitted,

EXELON NEW ENGLAND
POWER SERVICES, INC.

By its Attorneys,


HOLLAND & KNIGHT LLP

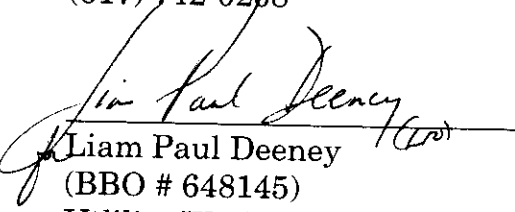

Liam T. O'Connell (BBO # 558249)
Paul G. Lannon, Jr. (BBO #563404)
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Boston, MA 02116
(617) 523-2700

UTILITY WORKERS, LOCAL 369,

By its Attorneys,

SEGAL, ROITMAN & COLEMAN


Paul F. Kelly (BBO # 267000)
11 Beacon Street, Suite #500
Boston, MA 02108
(617) 742-0208


Liam Paul Deeney
(BBO # 648145)
Utility Workers' Union of America
Local 369
120 Bay State Drive
Braintree, MA 02184

Dated: March 26, 2004

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I HEREBY CERTIFY THAT A TRUE COPY OF
THE ABOVE DOCUMENT WAS
UPON THE ATTENDANCE OF EACH
EACH OTHER PARTY BY COMPLETION

26 March 2004

HOLLAND & KNIGHT LLP

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March 26, 2004

LIAM T. O'CONNELL
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VIA HAND DELIVERY

Clerk
United States District Court
1 Courthouse Way
Suite 4110
Boston, MA 02210

Re: Utility Workers, Local 369 v. Exelon New England Power Services, Inc.
C.A. No. 04-CV-10293DPW

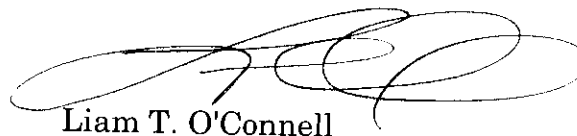
Dear Sir/Madam:

Enclosed for filing in the above-referenced matter please find a Joint Motion to Extend Time to File a Responsive Pleading.

Kindly acknowledge your receipt of this document by date-stamping the enclosed copy of this letter and returning it in the self-addressed, stamped envelope that has been enclosed herewith.

Sincerely yours,

HOLLAND & KNIGHT LLP



Liam T. O'Connell

LTO/wmg
Enclosures

cc: Paul F. Kelly, Esquire
Liam Paul Deeney, Esquire

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